

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Continental Casualty Company and)	
Continental Insurance Company,)	
)	
Plaintiffs,)	No. 07-C-6912
)	
v.)	
)	Honorable Judge Harry D. Leinenweber
Commercial Risk Re-Insurance Company,)	
Commercial Risk Reinsurance Company)	
Limited, General Security Indemnity)	Magistrate Judge Arlander Keys
Company of Arizona, General Security)	
National Insurance Company, GIE)	
Columbus, SCOR, and SCOR)	
Reinsurance Company)	
)	
Defendants.)	

AGREED MOTION TO STAY

Plaintiffs Continental Casualty Company and Continental Insurance Company (collectively "CNA") and Defendants Commercial Risk Re-Insurance Company, Commercial Risk Reinsurance Company Limited, General Security Indemnity Company of Arizona, General Security National Insurance Company, GIE Columbus, SCOR S.E., and SCOR Reinsurance Company (collectively "SCOR Group") hereby present their agreed motion to stay, and in support thereof state as follows:

1. The Parties are currently engaged in detailed settlement discussions and have been referred to Magistrate Judge Keys for a settlement conference.
2. As part of the settlement process, the Parties are currently reviewing numerous contracts and other materials.
3. These materials are voluminous, and the Parties will not likely be prepared in time for the currently scheduled settlement conference before Magistrate Keys.

4. During this review process, the Parties wish to avoid unnecessary litigation costs and focus their efforts on settlement.

5. The Parties agree that a temporary stay of this action will help facilitate settlement.

WHEREFORE, for the reasons set forth above, CNA and SCOR Group respectfully request that this honorable Court enter an order in substantially the same form as the order submitted herewith and stay this action in its entirety until October 28, and set this action for status on or after October 28, 2008.

Date: August 22, 2008

**Continental Casualty Company and
Continental Insurance Company**

**Commercial Risk Re-Insurance Company,
Commercial Risk Reinsurance Company
Limited, General Security Indemnity
Company of Arizona, General Security
National Insurance Company, GIE
Columbus, SCOR S.E., and SCOR
Reinsurance Company**

By: /s/ Thomas D. Cunningham
One of their attorneys

By: /s/Michael C. Kasdin
One of their attorneys

William M. Sneed
Thomas D. Cunningham
Serena B. Lee
SIDLEY AUSTIN LLP
One South Dearborn Street
Chicago, Illinois 60603
Tel (312) 853-7000
Fax (312) 853-7036

Stephen W. Schwab (ARDC # 6183518)
Carl H. Poedtke III (ARDC # 6237886)
Michael C. Kasdin (ARDC # 6283200)
DLA PIPER US LLP
203 North LaSalle Street, Suite 1900
Chicago, IL 60601
Tel (312) 368-4000
Fax (312) 236-7516